

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Anthony Parker	:	Chapter 13
	:	
Debtor(s)	:	Case No.: 19-14871-MDC

MOTION TO VACATE ORDER GRANTING RELIEF

Comes Now, Anthony Parker, hereinafter referred to as “Debtor” and moves this Honorable Court to vacate its November 15, 2021 Order granting relief from the automatic stay and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about August 1, 2019.
2. The Chapter 13 bankruptcy matter was assigned case number 19-14871.
3. The Chapter 13 Plan was confirmed on January 30, 2020.
4. On or about April 10, 2020 the Debtor and his mortgagee entered into a Stipulation resolving the Motion for Relief filed on February 24, 2020 by Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust.
5. The November 15, 2021 Order Vacating the Automatic Stay was entered after the mortgagee filed a Certification of Default.
6. At this time, the Debtor believes he is now current on his post-petition mortgage obligations.
7. If the Debtor is not current, he will become current prior to the scheduled hearing on the instant Motion.

WHEREFORE, for the reasons stated herein, the Debtor respectfully request that this Honorable Court Vacate its November 15, 2021 Order Modifying the Automatic Stay.

Respectfully submitted,

Dated: November 22, 2021

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Jeffrey A. Brennan and Margaret J. Brennan :	:	Chapter 13
	:	
Debtor(s)	:	Case No.: 18-15996

ORDER

AND NOW, this _____ day of _____ 2020, upon consideration of the Motion to Reconsider the July 30, 2020 Order Granting Relief from the Automatic Stay and a Hearing thereon, it is hereby;

ORDERED and DECREED that the stay will be reinstated and the Order dated July 30, 2020 shall be Vacated.

FURTHER ORDERED:

J.

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Jeffrey A. Brennan and Margaret J. Brennan :	:	Chapter 13
	:	
Debtor(s)	:	Case No.: 18-15996

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below I served a true and correct copy of the Motion To Reconsider the July 30, 2020 Order Modifying the Automatic Stay by Regular US Mail or electronic means on all creditors and the following parties:

MICHAEL JOHN CLARK
Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406

Dated: November 22, 2021

Respectfully submitted,

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Jeffrey A. Brennan and Margaret J. Brennan :	:	Chapter 13
	:	
Debtor(s)	:	Case No.: 18-15996

Notice of Motion, Response Deadline and Hearing Date

Brad J. Sadek, Esq., attorney for the Debtor, filed a Motion to Vacate the Order Modifying the Automatic Stay for the reasons detailed in the enclosed Motion.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this Bankruptcy case. (If you do not have an attorney you may wish to consult an attorney).

1. If you do NOT want the court to grant the relief sought in the motion, then on or before [9/28/20](#) you or your Attorney must do ALL of the following:

If you mail your answer to the clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (a) file an answer explaining your position at:
United States Bankruptcy Court
Eastern District of Pennsylvania
900 Market Street
Philadelphia, PA 19107
- (b) mail a copy to the movant's attorney:
Brad J. Sadek, Esq.
Sadek and Cooper
1315 Walnut Street, Suite 502
Philadelphia, PA 19107

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the enclosed motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on [10/6/20 at 9:30 am](#) at United States Bankruptcy Court, 900 Market Street, Courtroom #1, Philadelphia, Pennsylvania, 19107.

4. You may contact the Bankruptcy Clerks office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

